

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VIRGIL CHANDLER KNOWLES III and
SAMANTHA JEAN BATTS,

Defendants.

INDICTMENT

_____ /

The Grand Jury charges:

COUNT 1

(Sexual Exploitation of a Child)

On unknown dates between on or about July 13, 2021 and July 13, 2022, in Kalamazoo County, in the Southern Division of the Western District of Michigan, the defendants,

VIRGIL CHANDLER KNOWLES III and
SAMANTHA JEAN BATTS

knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, and aided and abetted in the same, for the purpose of producing visual depictions of such conduct, having reason to know that such visual depictions would be transmitted using a means and facility of interstate commerce and in and affecting interstate commerce.

Specifically, the defendants employed, used, persuaded, induced, enticed, and coerced a girl, Victim 1, who was approximately 10 years old, to engage in sexually

explicit conduct, including the lascivious exhibition of her genitals. The defendants produced videos and images which depicted the sexually explicit conduct, having reason to know they would be transmitted over the internet, including through the messaging application WICKR by username *kinkycumplay* and through the messaging application SnapChat by username *darnwp*.

18 U.S.C. § 2251(a) and (e)
18 U.S.C. § 2

COUNT2
(Distribution of Child Pornography)

On or about July 13, 2022, in Kalamazoo County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

VIRGIL CHANDLER KNOWLES III,

knowingly distributed child pornography that was shipped and transported in and affecting interstate commerce by any means, including by computer. The defendant distributed approximately five digital files containing child pornography from the Southern Division of the Western District of Michigan to a recipient in the area of Washington, D.C., through the social media application WICKR, by username *kinkycumplay*, and through the social media application SnapChat, by username *darnwp*.

18 U.S.C. § 2252A(a)(2)(A) and (b)(1)
18 U.S.C. § 2256(8)(A)

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



AUSTIN J. HAKES
Assistant United States Attorney